

The issue regarding the lack of support in the specification for the concept the "reusability of the substrate after the honeycomb has been removed" is incorrect. Support for this concept is found on page 8, lines 23 and 25. In addition, see page 1, lines 27-28, in the background of the specification. This is ample support for the introduction of the term objected to by the Examiner; and in view of this, its introduction is not new matter.

As for the rejection of claims 1-8 on the basis that new matter has been introduced and therefore the claims do not conform to 35 USC 112 first paragraph, the arguments made above refute this rejection. Again, support for the amended language to the claims is present in the specification and therefore does not constitute the introduction of new matter as offered by the Examiner.

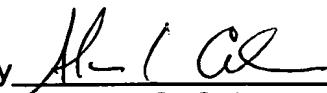
As regards the obviousness rejection under 35 USC 103 based on the references to McComas and Peters et al, this rejection cannot be sustained. The Examiner has stated that "...the test for combining references is what the combination of disclosures taken as a whole would suggest to one of ordinary skill in the art." A review of what the combination of these two references would teach is clear and is not what is claimed by the Applicant. McComas teaches removing a surface coating of an abradable, wear resistant, thermal barrier, abrasive and hard facing coatings which have been applied by either plasma spraying or sintering. The process in this reference is one of applying a high pressure spray onto the top of the surface being removed utilizing liquid erosion. The present claimed invention does not remove the honeycomb by directing a spray onto the honeycomb. It directs the liquid so that upon exiting the nozzle the liquid stream "...striking the substrate at the base of the honeycomb...". There is no suggestion or teaching from the McComas reference which would suggest doing this, nor is one supplied by the Peters reference. The Peters reference teaches "cutting" the honeycomb and not removing it from a substrate. In fact, as was argued in the previous amendment, by the act of combining these two references would necessarily result in the destruction of the substrate, a result the present claims require. The Examiner is not free to pick and choose the elements of similarity to the present claimed invention and ignore others.

In this case the Examiner takes the view that the McComas reference teaches the removal of an unwanted layer of material form a substrate using a high pressure liquid. Peters teaches cutting a honeycomb structure by a liquid spray and concludes that cutting is a means of removal. The Examiner ignores the fact that the Peters reference is "removing" the honeycomb structure by cutting through it not by removing it form the surface of a substrate. Further the McComas reference teaches removal of the layer form the substrate by a particular method of erosion using a liquid material. Nothing in these references either alone or in combination would teach one skilled in the art the invention as claimed with the limitation as set forth in those claims.

In regards to the Examiner's inquiry as to whether or not the term "energy" as used in line 16 of page 5 of the specification is correct, Applicants state that it is and need not be changed.

Therefore, Applicant respectfully requests that the Examiner reconsider the rejection in view of these arguments and amendments and admit this response after final. In the event that the Examiner is not persuaded by the argument set forth herein, Applicants request that this amendment be admitted for purposes of placing the application in better condition for appeal to the Board of Appeals.

Respectfully submitted

By 

Alan C. Cohen  
Registration No. 31,073

Pratt & Whitney  
Patent Department  
Mail Stop 132-13  
400 Main Street  
East Hartford, CT 06108

Tel: (860) 565-2812